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Kurt A. Gustafson, Francois Lebel, William L. Ashton,  
Nora E. Brennan, Seth H.Z. Fischer, Juhyan Lim,  
Thomas J. Riga, Jeffrey L. Vacirca, Dolatrai M. Vyas,  
Bernice R. Welles, and for Nominal Defendant  
Spectrum Pharmaceuticals Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MEHMET ALI ALBAYRAK, Derivatively on  
Behalf of SPECTRUM PHARMACEUTICALS  
INC.,

Plaintiff,

v.

JOSEPH W. TURGEON, KURT A.  
GUSTAFSON, FRANCOIS LEBEL,  
WILLIAM L. ASHTON, NORA E.  
BRENNAN, SETH H.Z. FISCHER, JUHYUN  
LIM, THOMAS J. RIGA, JEFFREY L.  
VACIRCA, DOLATRAI M. VYAS, and  
BERNICE R. WELLES,

Defendants,

and

SPECTRUM PHARMACEUTICALS INC.,

Nominal Defendant.

CASE NO. 2:22-CV-00932-JCM-DJA

**STIPULATION AND  
ORDER GRANTING DISMISSAL OF  
PLAINTIFF'S VERIFIED DERIVATIVE  
COMPLAINT**

Plaintiff Mehmet Ali Albayrak, ("Plaintiff") derivatively and on behalf of nominal defendant Spectrum Pharmaceuticals Inc. ("Spectrum" or the "Company"), and defendants Joseph W. Turgeon, Kurt A. Gustafson, Francois Lebel, William L. Ashton, Nora E. Brennan, Seth H.Z. Fischer, Juhyan Lim, Jeffrey L. Vacirca, Dolatrai M. Vyas, and Bernice R. Welles ("Defendants" and together with the Plaintiff and Spectrum, the "Parties") jointly submit this Stipulation ("Stipulation"), and in support thereof state as follows:

